

## ***EPA Actions on CLI Recommendations***

During the April 7-8, 1999, Partner and Task Force meeting, the EPA discussed how it intended to address the recommendations made during the September 1998 Partner and Task Force meeting. The EPA's Office of Pesticide Programs (OPP) is handling the recommendations for label changes, and it presented a draft strategy for dealing with those recommendations at the April 1999 meeting. Also at the meeting, planning was initiated for a CLI media event in Spring 2000, to announce the CLI recommendations; and updates on both the completion of the Phase II Report and the Consumer Education Campaign activities were presented.

### **Draft OPP Strategy for Implementation of the Phase II Label Changes**

OPP's draft strategy for implementing some of the CLI recommendations, presented in the April 1999 Partner and Task Force meeting, includes the following:

1. OPP will circulate an internal guidance memorandum to forewarn EPA product managers about the type of paperwork to expect coming from companies making label changes recommended by the CLI. The memo would cover label changes that can be approved now, changes that would be considered on a case-by-case basis, and changes that would not be considered at present. These draft changes are listed below.
2. Revised First Aid statements have been agreed upon and a draft *Pesticide Registration (PR)* notice announcing these new statements is currently being reviewed by EPA staff. The PR notice is expected to be issued in Fall/Winter 1999.
3. PR notices for all recommendation topics will be issued after the guidance memo. Some PR notices may be issued as "final" notices without a time period allotted for public comment, while others will be issued "for comment."
4. Label changes will apply to all FIFRA regulated pesticide products, not just consumer pesticides and household cleaners.
5. Sometime in the future, the PR notices will be incorporated into EPA regulation, where necessary.

### ***Label Changes That Can be Submitted Now***

While manufacturers must abide by current regulations, they can submit the following label changes to the OPP (see Appendices 3-3 to 3-6 for examples of some of these label changes):

- # adding hazard bullet points under signal words;
- # removing inappropriate language on consumer labels;
- # providing information on "other ingredients" in a variety of ways; and
- # presenting first aid information in simplified formats, including a toll-free number, and using the new revised First Aid statements.

Changes to the overall label format and presentation that can currently be made include:

- # use of preferred statements;
- # use of simpler language and less jargon;
- # use of revised hazard and use statements;
- # use of bullet formats;
- # avoidance of narrative text formats (e.g., using bullets and headings);
- # keeping sections together in the same column;
- # using white space;
- # eliminating needless words, while still abiding by current regulations;
- # adding numbers for sequential actions;
- # use of tables;
- # adding sub-heading into the Directions for Use section; and
- # rearranging precautionary statements to give prominence to those of greater interest.

***Label Changes That Need to be Discussed with EPA Product Managers Before Submitting***

- # changing the location of the ingredients statement.

***Label Changes That Cannot be Submitted at Present Time***

- # changing, combining, or deleting headings;
- # locating storage and disposal instructions outside of the Directions for Use section;
- # revising the Federal misuse statement; and
- # leaving off the signal word for products in toxicity category 4.

## **CLI Media Event**

During the April 1999 Partner and Task Force meeting, the EPA informed CLI Stakeholders about plans for an upcoming media event, to announce some of the labeling recommendations that EPA will be making as a result of the CLI. Plans for the media event were postponed until Spring 2000, however, to coincide with the ‘kick-off’ of the CLI Consumer Education Campaign; the media event will serve as the ‘kick-off’ event for the “Read the label *FIRST!*” Campaign. This launch is timed to coincide the appearance of newly redesigned labels on store shelves with consumers’ general interest in seasonal gardening and cleaning activities. Eventually, the

Consumer Education Subgroup intends to finalize and make available to the public a variety of educational materials (e.g., brochures, pamphlets, etc.).

1. The goals of the media event are to announce to the public CLI's accomplishments, inform the public that labels are changing to become simpler, promote the "Read the Label *FIRST!*" campaign, promote the CLI partnership between EPA and its Stakeholders, and increase consumer awareness in general regarding product labels.
2. The media event is scheduled for Spring 2000. It was proposed at the April 1999 meeting that because the event serves as a way in which to reach the general public, a well-known public figure may be appropriate to convey the messages of the event, in addition to the EPA and CLI Partners.
3. The target audience for the media event is the general public, the trade press, community newspapers, and lifestyle magazines.
4. Messages for the event will be drafted by EPA and circulated to CLI Partners and other Stakeholders prior to the event.

## **Completion of the Phase II Report**

An update on the Phase II Report and details for its completion were presented to CLI Partner and Task Force members during the April 1999 meeting. Partners and Task Force members were informed that all of EPA's recommendations on label changes, as a result of CLI, will be included in the Report. Partner and Task Force members agreed that displaying the Phase II findings on the Internet before the completion of the Report would be counterproductive and, therefore, resources should be spent on completion of the Report.

## **Consumer Education Campaign**

An update of the activities since the September 1998 Partner and Task Force meeting regarding the Consumer Education Campaign was presented during the April 1999 meeting.

1. Upon recommendation from the September Partner and Task Force meeting, the Consumer Education Subgroup had been expanded to include marketing, brand, outreach, and public relations experts.
2. A message development group was formed to develop the messages for the "Read the Label *FIRST!*" campaign, for use in both outreach fliers and/or brochures.
3. A message placement group was also formed to identify and implement the most appropriate avenues for distributing the messages and products for the Consumer Education Campaign in order to promote the "Read the Label *FIRST!*" campaign.
4. Ideas for generating a unique logo for the "Read the Label *FIRST!*" campaign were shared during the April 1999 Partner and Task Force meeting. Logo design concepts included the idea of a design competition or contracting with a graphic designer to produce the logo. The goal would be to have a logo in place that companies and other

CLI participants could use on products, in advertising, and on education materials in time for the Spring 2000 promotion period.